



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Via Electronic and U.S. Postal Service Mail

August 9, 2011

Jerry Boyd, P.G.  
Senior Geologist  
Environmental Partners, Inc.  
295 NE Gilman Boulevard, Suite 201  
Issaquah, WA 98027

**Re: Polychlorinated Biphenyls – Request to Amend the July 11, 2011 “*Final Risk-Based PCB Disposal Approval Application Former Petrolane-Lomita Gas Plant*” – USEPA Conditional Approval of August 9, 2011 Amendment Letter**

Dear Mr. Boyd:

Thank you for the attached August 9, 2011 letter (Amendment Letter; Subject: Request for Alteration, “*Final Risk-Based PCB Disposal Approval Application Former Petrolane Lomita Gas Plant*”) submitted on behalf of AmeriGas Partners, LP (AmeriGas). In that Amendment Letter, Environmental Partners, Inc. (EPI) proposes to amend the “*Final Risk-Based PCB Disposal Approval Application Former Petrolane-Lomita Gas Plant 2851 Orange Avenue Long Beach California EPA ID No. CAR000214189*” dated July 11, 2011 (Application)<sup>1</sup>. The U.S. Environmental Protection Agency Region 9 (USEPA) approved the Application on July 29, 2011 under the Toxic Substances Control Act (TSCA) regulations in 40 CFR 761.61(c).

USEPA approves the Amendment Letter with conditions. This approval amends the Application and modifies USEPA’s July 29, 2011 letter approving the Application.

EPI proposes to amend Section 5.3.2 (Excavation Plan) of the Application in reference to concrete<sup>2</sup> contaminated with polychlorinated biphenyls (PCBs) that will be removed from former Buildings K and L at the Petrolane Cleanup Site (PCS)<sup>3</sup> located within the former Petrolane Lomita Gas Plant Site. Section 5.3.2 requires that PCB contaminated concrete be placed in transport trailers as the waste is being generated; and the loaded concrete be transported to the offsite disposal facility. Instead of this approach, EPI proposes to remove and temporarily store as a stockpile(s) the contaminated concrete to be excavated

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<sup>1</sup> The Application was prepared by Environmental Partners, Inc. on behalf of AmeriGas Partners, LP and is for a risk-based cleanup of polychlorinated biphenyls at the Former Petrolane Lomita Gas Plant in Long Beach, California.

<sup>2</sup> Concrete is defined as a porous surface under the TSCA PCB regulations and PCB remediation waste encompasses porous surfaces contaminated with PCBs. Disposal of PCB contaminated porous surfaces is subject to the disposal requirements for bulk PCB remediation waste.

<sup>3</sup> The PCS encompasses the areal extent of PCB contamination including the areas where former Buildings G, K, L, and N were located and any areas in proximity (e.g., areas outside the estimated Petrolane property boundary) to the PCB contamination that may also be impacted by PCBs.

Jerry Boyd, P.G.

Re: Request for Amendment to Approved

40 CFR 761.61(c) PCB Cleanup Application

Date: August 9, 2011

from former Buildings K and L. EPI proposes to store the concrete for less than 30 days and to follow the storage requirements in 40 CFR 761.65(c)(9).

Consistent with 40 CFR 761.61(c), USEPA may approve a method to store PCB remediation waste in a manner different than that required in 40 CFR 761.65. See 40 CFR 761.65(c)(9)(iv). Therefore, USEPA is approving the Amendment Letter under 40 CFR 761.61(c)(1) provided that:

1. All PCB contaminated concrete is stockpiled as described in the Amendment Letter and within the PCS; and
2. The transporter of the PCB remediation waste submit to USEPA HQ the Notification of PCB Activity Form in accordance with the requirements in 40 CFR 761.205 and comply with the manifest requirements of 40 CFR 761.207 through 761.209 before transporting this waste to the offsite disposal facility.

We also take this opportunity to clarify that in reference to PCB contaminated soils at the PCS, the transporter of that PCB remediation waste must also submit the Notification of PCB Activity Form before transporting the waste to the offsite disposal facility.

We look forward to being of assistance during AmeriGas and EPI's implementation of the Application for cleanup of PCBs at the former Petrolane Lomita Gas Plant as modified herein. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,



Jeff Scott  
Director  
Waste Management Division

Enclosure

Cc: Steven A. Samuel, AmeriGas Partners LP  
Amy Bodek, City of Long Beach  
Steve Lavinger, California DTSC  
Steve Armann, USEPA R9  
Carmen Santos, USEPA R9